

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NEW YORK

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In re:

ORION HEALTHCORP, INC.<sup>1</sup>

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Debtors.

HOWARD M. EHRENBERG IN HIS CAPACITY AS  
LIQUIDATING TRUSTEE OF ORION  
HEALTHCORP,  
INC., ET AL.,

Plaintiff,

v.

ABRUZZI INVESTMENTS, LLC; JOHN PETROZZA,

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Defendants.

**DECLARATION OF JEFFREY P. NOLAN IN SUPPORT OF RESPONSE AND  
LIMITED OPPOSITION OF PLAINTIFF, HOWARD M. EHRENBERG, TO  
APPLICATION TO WITHDRAW AS ATTORNEY OF RECORD FOR DEFENDANTS  
ABRUZZI INVESTMENTS L.L.C. AND JOHN PETROZZA**

I, Jeffrey P. Nolan, declare as follows:

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: Orion Healthcorp, Inc. (7246); Constellation Healthcare Technologies, Inc. (0135); NEMS Acquisition, LLC (7378); Northeast Medical Solutions, LLC (2703); NEMS West Virginia, LLC (unknown); Physicians Practice Plus Holdings, LLC (6100); Physicians Practice Plus, LLC (4122); Medical Billing Services, Inc. (2971); Rand Medical Billing, Inc. (7887); RMI Physician Services Corporation (7239); Western Skies Practice Management, Inc. (1904); Integrated Physician Solutions, Inc. (0543); NYNM Acquisition, LLC (unknown) Northstar FHA, LLC (unknown); Northstar First Health, LLC (unknown); Vachette Business Services, Ltd. (4672); Phoenix Health, LLC (0856); MDRX Medical Billing, LLC (5410); VEGA Medical Professionals, LLC (1055); Allegiance Consulting Associates, LLC (7291); Allegiance Billing & Consulting, LLC (7141); New York Network Management, LLC (7168). . The corporate headquarters and the mailing address for the Debtors listed above is 1715 Route 35 North, Suite 303, Middletown, NJ 07748.

1. I am an attorney at law duly licensed to practice before all courts in the State of California and in the Central and Eastern Districts. I am an attorney with the law firm of Pachulski Stang Ziehl & Jones LLP, counsel of record for Plaintiff, Howard M. Ehrenberg In his Capacity as Liquidating Trustee of Orion Healthcorp. Inc. I submit this declaration in support of the Response and Limited Opposition.

2. The facts stated herein are of my own personal knowledge. If called upon, I could and would competently testify thereto.

3. By agreement of counsel, on April 17, 2020 I extended the deadline date for Defendants to file an answer to the Complaint to May 15, 2020.

4. On June 1, 2020, I caused to be served *Request for Production of Documents to Defendant Abruzzi Investments, LLC, and to Defendant John Petrozza*. On June 2, 2020, I caused to be served Interrogatories *to Defendant Abruzzi Investments, LLC, and to Defendant John Petrozza, and Request for Admissions to Defendant Abruzzi Investments, LLC*. On two separate occasions, counsel for the Defendants requested an extension to respond to the discovery requests. The second request was granted based upon his intent to withdraw and to allow new counsel the opportunity to address. The last extension expired on July 30, 2020. Plaintiff has received no documents or written responses.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 2<sup>nd</sup> day of September, 2020 at Los Angeles, California.

/s/ Jeffrey P. Nolan  
Jeffrey P. Nolan